

EXHIBIT C

Zakarin, Donald S.

From: Zakarin, Donald S.
Sent: Monday, May 13, 2024 12:44 PM
To: Tyrone Blackburn
Cc: Janowitz, James A.; Charron, William
Subject: dismissing SAC
Attachments: declaration for dismissal.docx; Voluntary Dismissal_.docx

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Mr. Blackburn:

Attached is a short draft declaration for you, consistent with our discussions and a notice of motion. We would, upon your filing it, submit our agreement to the dismissal. I would think if it is filed today, the Judge will likely issue an order today.

Donald S. Zakarin

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UNITED STATES FEDERAL COURT
SOUTHERN DISTRICT OF NEW YORK

RODNEY JONES,

Plaintiff,

v.

SEAN COMBS,
JUSTIN DIOR COMBS
CUBA GOODING JR.,
LUCIAN CHARLES GRAINGE,
KRISTINA KHORRAM,
LOVE RECORDS,
MOTOWN RECORDS,
UNIVERSAL MUSIC GROUP,
COMBS GLOBAL ENTERPRISES,
JOHN and JANE DOES 1-10 and
ABC CORPORATIONS. 1-10

Defendants.

Case Number: 24-1457

**Declaration of Tyrone A. Blackburn In
Support of Plaintiff's Motion For Dismissal
Of All Claims and Allegations Against Lucian
Charles Grainge, Motown Records and UMG
Recordings, Inc. (Incorrectly named as
Universal Music Group**

I, Tyrone A. Blackburn, declare as follows:

1. I am the principal of Tyrone A. Blackburn Law, PLLC. I am counsel in this case for the Plaintiff, Rodney Jones. I have personal knowledge of the facts set forth in this Declaration and if called and sworn as a witness, I could and would competently testify thereto.

2. I submit this declaration in support of the Plaintiff's motion, pursuant to Rules 15, 21 and 41 of the Federal Rules of Civil Procedure, for the dismissal with prejudice of all claims made in the Second Amended Complaint against Lucian Charles Grainge, Motown Records and Universal Music Group (which I am advised was incorrectly named in the Second Amended Complaint and is properly named as UMG Recordings, Inc.), to amend the Second Amended Complaint solely to the extent of deleting therefrom all references to and allegations made

against Mr. Grainge, Motown Records and Universal Music Group/UMG Recordings, Inc. (collectively the “UMG Defendants”) and amending the caption to remove them therefrom.

3. The UMG Defendants have made two motions to dismiss, first directed against the First Amended Complaint and then against the Second Amended Complaint. Based on my examination of all of the papers submitted in support of both motions to dismiss, I have concluded that there is no legal or factual basis for the claims and allegations that were made against the UMG Defendants by Mr. Jones. As such, I have determined that the proper course of action is for all of the claims and all of the allegations to be withdrawn immediately and the Second Amended Complaint as against the UMG Defendants be dismissed with prejudice. And to accomplish the striking of all references to the UMG Defendants in the Second Amended Complaint, I respectfully request that the Second Amended Complaint be deemed amended to delete therefrom any and all references to the UMG Defendants.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated May 13, 2024

Tyrone A. Blackburn

UNITED STATES FEDERAL COURT
SOUTHERN DISTRICT OF NEW YORK

RODNEY JONES,

Plaintiff,

v.

SEAN COMBS,
JUSTIN DIOR COMBS
CUBA GOODING JR.,
LUCIAN CHARLES GRAINGE,
KRISTINA KHORRAM,
LOVE RECORDS,
MOTOWN RECORDS,
UNIVERSAL MUSIC GROUP,
COMBS GLOBAL ENTERPRISES,
JOHN and JANE DOES 1-10 and
ABC CORPORATIONS. 1-10

Defendants.

Case Number: 24-1457

Notice Of Motion For Voluntary Dismissal Of
All Claims and Allegations Against Lucian
Charles Grainge, Motown Records and UMG
Recordings, Inc. (Incorrectly named as
Universal Music Group)

~~PLAINTIFFS VOLUNTARY DISMISS OF LUCIAN CHARLES GRAINGE, MOTOWN
RECORDS, AND UNIVERSAL MUSIC GROUP ("UNIVERSAL DEFENDANTS") FOR
ALL CLAIMS REFERENCED IN THE SECOND AMENDED COMPLAINT~~

~~PLEASE TAKE NOTICE that, upon the supporting Declaration of Tyrone A.
Blackburn dated May 13, 2024, and all prior proceedings heretofore had and all papers filed herein,
Plaintiff Rodney Jones will move this Court, at a date and time to be determined by the Court, for an
Order, pursuant to Rules 15, 21 and 41 of the Federal Rules of Civil Procedure, dismissing all claims
and striking all allegations made against Lucian Charles Grainge, Motown Records, UMG Recordings,
Inc. (incorrectly named as Universal Music Group) in the Second Amended Complaint with prejudice
and removing Lucian Charles Grainge, Motown Records, UMG Recordings, Inc. (incorrectly named
as Universal Music Group) from the caption of this action. PLEASE TAKE NOTICE that pursuant
to Fed. R. Civ. P. 41(a)(2), the plaintiff requests that the Court enter an order dismissing the~~

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Universal Defendants from all claims they are referenced in the Second Amended Complaint With
Prejudice.

~~PLEASE TAKE NOTICE that the Universal Defendants consent to this request, as
evidenced by the signature below:~~

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T. A. BLACKBURN LAW, PLLC.
By:
Tyrone A. Blackburn, Esq.
Attorney for Plaintiff

~~PRYOR CASHMAN, LLP
By:
Donald S. Zakarin, Esq.
Attorney for Universal Defendants~~